

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**No. 21-CR-0668-JB**

**TIFFANY ROBINSON,**

**Defendant.**

**UNOPPOSED MOTION TO CONTINUE TRIAL  
AND MOTION TO EXTEND TIME TO FILE MOTIONS**

Defendant Tiffany Robinson (“Ms. Robinson”), through undersigned counsel, respectfully moves the Court to continue the trial currently set for August 9, 2021 for sixty (60) days, and to grant a corresponding extension of time to file motions. As grounds for this motion, Ms. Robinson states the following:

1. Ms. Robinson was indicted on May 12, 2021, on counts of possession of methamphetamine with the intent to distribute and felon in possession of a firearm. Doc. 2. She was arraigned on June 11, 2021. This Court set his case for trial on August 9, 2021. Doc. 16. Undersigned counsel was recently retained, having entered an appearance on July 27, 2021. Doc 17.
2. Undersigned counsel requires additional time to receive and review the discovery in this case, investigate all possible defenses, and file appropriated pretrial motions.
4. This is the first request for a continuance.
6. Ms. Robinson is in custody.
7. AUSA Shana Long does not oppose this motion.

Pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), a continuance will allow for the reasonable time necessary to obtain and review discovery and investigate all possible defenses, considering the exercise of diligence. The requested continuance will not give rise to a Speedy Trial Act violation. The additional time required by the continuance may properly be excluded under 18 U.S.C. § 3161(h)(7) on the ground that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial. Failure to grant the continuance would "deny counsel for the defendant ... the reasonable time necessary for effective preparation, taking into account the exercise of due diligence." 18 U.S.C. § 3161(h)(7)(B)(iv).

WHEREFORE, for the foregoing reasons, the Defendant (Ms. Robinson), through undersigned counsel, respectfully requests that this Court vacate the current jury trial setting of August 9, 2021, and related motions deadlines.

Respectfully Submitted:

By: /s/ Joe M. Romero, Jr.  
Joe M. Romero, Jr.  
ROMERO & WINDER, PC  
*Attorney for Plaintiffs*  
1905 Lomas Blvd, NW  
Albuquerque, NM 87104  
Phone: (505) 843-9776  
Fax: (505) 212-0273  
[joe@romeroandwinder.com](mailto:joe@romeroandwinder.com)

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 28<sup>th</sup> day of July 2021, I filed the foregoing electronically through the CM/ECF system and served the same to opposing counsel.

By: /s/ Joe M. Romero, Jr.  
Joe M. Romero, Jr.